

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF

VS.

CIVIL ACTION NO.: 3:22-cv-686-HTW-LGI

THE CITY OF JACKSON,
MISSISSIPPI

DEFENDANT

DEFENDANT THE CITY OF JACKSON RESPONSE TO
REQUEST FOR ORGANIZATIONS TO ATTEND
JULY 12, 2023 STATUS CONFERENCE

Defendant the City of Jackson (the “City Defendant”) respectfully files this Response to the July 7, 2023 Status Conference request for organizations to attend the July 12, 2023 Status Conference:

In accordance with the Court’s July 7, 2023 (1) invitation to hear first-hand from organizations with concerns regarding transparency and lack of communication from the Interim Third Party Manager; and (2) request that representatives of the Jackson Fire Department appear to address their concerns about maintenance and control of fire hydrants, the City of Jackson offers this response regarding representatives in attendance July 12, 2023 at the Status Conference:

Representatives from the Jackson Fire Department:

- Deputy Fire Chief, Emergency Services Division, **Elliott C. Holmes**
- District Chief, Water Supply Officer, **Roderick D. Wilson**
- Exhibits offered to supplement the record:
 - Exhibit A April 6, 2023 to April 13, 2023 Emails
 - Exhibit B April 20, 2023 Email from Jordan Rae Hillman
 - Exhibit C House Fire #1 1178 West McDowell Road

- Exhibit D June 2, 2023 Email from Chief Willie Owens
- Exhibit E House Fire #2 854 Carver Street
- Exhibit F June 19, 2023 Email from Jordan Rae Hillman
- Exhibit E June 19, 2023 Memo from JXN Water

Representatives Requesting the Opportunity to Speak:

- **Andy Kricun** (akricun@aol.com)
 - Member of the Environmental Protection Agency, National Environmental Justice Advisory Council (NEJAC), Co-Chair of NEJAC Water Infrastructure Committee
 - Mr. Kricun previously served as a consultant to the City of Jackson as a Senior Fellow at the U.S. Water Alliance from June to August 2022 (overlapping with the August 2022 water crisis)
 - At the end of his two (2) year fellowship with U.S. Water Alliance, he began work with numerous other organizations in September 2022 to continue consulting with the City of Jackson and the Unified Command Staff throughout the August 2022 water crisis.
 - Mr. Kricun continues to serve as a consultant on matters affecting the City of Jackson's water system.
 - Mr. Kricun possesses a professional engineer's license in Civil Engineering, and he is a board-certified member of the American Association of Environmental Engineers with 30 years of experience in managing water systems.
- **Nsombi Lambright**(nlambright@uniteonevoice.org)
 - National Association for the Advancement of Colored People (NAACP)¹
- **Waikinya Clanton** (waikinya.clanton@splcenter.org)
 - Southern Poverty Law Center (SPLC)
- **North East Jackson Residents**
 - Dominic Deleo, Berkely Drive
 - Brooke Floyd, Kelton Drive

¹ Nsombi Lambright speaking for NAACP, but also a Representative of One Voice, Mississippi.

- Candace Abdul-Tawwab, Moss Forest Circle
- **Chevon Chattman** (cchatman.wtj@gmail.com)
 - Working Together Jackson
- **Efren Nunez** (efren@iajems.org)
 - Immigrant Alliance for Justice and Equity
- **Makani Themba** (makanithemba@gmail.com)
 - Mississippi Rapid Response Coalition
- **Danyelle Holmes** (danyelle@poorpeoplescampaign.com)
 - Mississippi Poor People's Campaign
- **Emily Johnson** (em.johnson710@gmail.com)
 - Grace House
- **Maise Brown** (maisieb2001@gmail.com)
 - Student Water Relief
- **Arekia Bennett Scott** (arekia@msvotes.org)
 - Mississippi Votes
- **Okolo Rashid** (okolo.rashid@muslimmuseum.org)
 - Beloved Community/International Museum of Muslim Culture
- **Rukia Lumumba** (rukia@peoplesadvocacyinstitute.com)
 - People's Advocacy Institute
- **Dr. Erick Ellis** (erick_ellis@hotmail.com)
 - Board Member and Vice President for the Willowood Neighborhood Association
 - Notified July 11, 2023 of his inability to attend due to illness

Organization Attorneys Present on Behalf of Their Clients:

- **American Civil Liberties Union**
 - Represented by Claudia Williams Hyman, Senior Staff Attorney and McKenna Raney-Gray, Staff Attorney (MRaney-Gray@aclu-ms.org; cwilliamshyman@aclu-ms.org)
- **Center for Constitutional Rights**
 - Represented by Emily Rutledge Early, Associate Director of the Southern

Regional Office and Jessica Vosburgh, Staff Attorney
(eearly@ccrjustice.org; jvosburgh@ccrjustice.org)

▪ **Forward Justice**

- Represented by Lori Sherman, Democracy and Economic Fellow and Kathleen Roblez, Senior Voting Rights Counsel & Litigation Manager (lsherman@forwardjustice.org; kroblez@forwardjustice.org)

▪ **Natural Resources Defense Council**

- Represented by Sarah Tallman, Senior Attorney (stallman@nrdc.org)

Other Known Organizations in Attendance:

▪ **Alternate Roots**

- Represented by Wendy Shenefelt (wendy@alternateroots.org)

▪ **Institute for Democratic Education in America (IDEA)**

- Represented by Rosaline McCoy, Director of Family and Community Engagement
-

In addition to being allowed to speak, attorneys representing several of these organizations have requested that they be allowed to submit to this Court a written record of their concerns.

WHEREFORE, PREMISES CONSIDERED, Defendant City of Jackson, respectfully requests that this Court take notice of this Response and its attached exhibits. Defendant further requests any additional relief to which it may be entitled.

Dated: July 12, 2023.

Respectfully submitted on behalf of the
Defendant City of Jackson,

/s/ Catoria Martin
Catoria Martin MSB# 103938

OFFICE OF THE CITY ATTORNEY

455 East Capitol Street
Post Office Box 2779
Jackson, Mississippi 39207-2779
601.960.1799 telephone
601.960.1756 facsimile

CERTIFICATE OF SERVICE

I certify that on the date indicated below I electronically filed the foregoing via the Court's CM/ECF system, which sent notification of the filing to all counsel of record.

/s/ Catoria Martin

Dated: July 12, 2023
